

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

UNITED STATES OF AMERICA

*

v.

*

Crim. No. DKC-13-0047

TONNIE FLOYD

*

* * * * *

**MOTION FOR LEAVE TO AMEND, SUPPLEMENT, WITHDRAW
OR FILE ADDITIONAL MOTIONS**

The defendant, Tonnie Floyd, through undersigned counsel, hereby respectfully moves this Honorable Court for leave to amend, supplement, withdraw or file additional motions, and in support of this Motion says:

1. The defendant, Tonnie Floyd, has been charged in a six count superceding indictment with robbery, conspiracy to commit robbery, carjacking and the use of a firearm during the commission of the robbery and the carjacking in violation of 18 U.S.C. §§ 1951(a), 2119, and 924(c). Mr. Floyd will be arraigned on March 28, 2013.

2. The defendant requests leave to amend any motion as becomes necessary during the course of this case.

3. Counsel for the defendant is in the beginning stage of investigation in this case. The defendant therefore requests leave to file any motion that may be appropriate to the content of any discovery or information subsequently obtained through investigation or produced by the government, whether or not such motion is mandatory under Rule 12(b)(3).

4. The defendant requests leave to withdraw any Motion, prior to any ruling by the

Court, if the relief requested in such motion is no longer desired or appropriate.

WHEREFORE, the defendant requests that this Honorable Court:

A. Allow the defendant to amend, supplement, withdraw, or file additional motions as necessary; and

B. Grant such other and further relief as the nature of the defendant's cause may require.

Respectfully submitted,

JAMES WYDA
Federal Public Defender

/s/_____
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